

LAW OFFICE OF ANTHONY CECUTTI

217 Broadway, Suite 707
New York, New York 10007
Phone: (212) 619-3730
Cell: (917) 741-1837
Fax: (212) 962-5037
anthonycecutti@gmail.com

May 7, 2021

BY ECF

The Honorable Sidney H. Stein
United States District Court Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

Re: United States v. Robert Locust, 18 Cr. 289 (SHS)

Dear Judge Stein:

We represent Robert Locust in the above-referenced matter, having been appointed pursuant to the provisions of the Criminal Justice Act ("CJA"), 18 U.S.C. § 3006A. On May 28, 2019, following a three-week trial, Mr. Locust was convicted of one count, conspiracy to commit mail and wire fraud. Mr. Locust was not convicted of any substantive offenses. Completion of sentencing is scheduled for May 7, 2021.

The purpose of this letter is to respectfully request a two-month adjournment of Mr. Locust's completion of sentencing based in part on the COVID-19 pandemic and health crisis, and a car accident that Mr. Locust was involved in. Mr. Locust wants to appear in person. However, he is not fully vaccinated. Additionally, he is engaged in physical therapy. Two additional months will allow Mr. Locust to receive his second dose of the vaccine and complete his needed physical therapy. Lastly, we also note that Mr. Locust's motions for reconsideration of his sentencing and objection to the Government's request for forfeiture and restitution as they pertain to him, are pending. Accordingly, we believe that an adjournment of sentencing is necessary.

We respectfully request an adjournment of sentencing until July, 2021. After conferring with the Government, the Government opposes our request.

Thank you for your consideration.

Respectfully submitted,

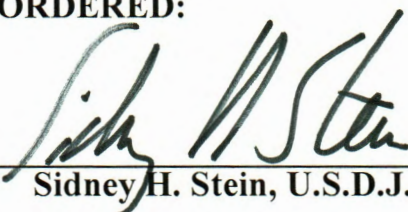
/s/

Anthony Cecutti
Mitchell Dinnerstein

The sentencing is adjourned to July 9, 2021, at 11:00 a.m.

**Dated: New York, New York
May 7, 2021**

SO ORDERED:



Sidney H. Stein, U.S.D.J.